

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

HELEN V. ARTHUR, Individually)
and as Executrix of the Estate)
of Charles E. Arthur, Deceased,)
Plaintiff)
vs.)
B. F. GOODRICH CHEMICAL)
COMPANY, et al.,)
Defendants)

Case No. 77-976623

Judge Burt W. Griffin

REQUESTS BY DEFENDANT DOW
CHEMICAL COMPANY FOR
ADMISSIONS BY PLAINTIFF
(First Set)

Defendant DOW CHEMICAL COMPANY (hereafter "Dow")
hereby requests pursuant to the provisions of Rule 36 of the
Ohio Rules of Civil Procedure that plaintiff admit, as pro-
vided in that Rule, each of the following propositions of fact:

1. Plaintiff does not have any information that
vinyl chloride manufactured by Dow was used at the premises
of B. F. Goodrich or B. F. Goodrich Chemical Company while
plaintiff's decedent was working there.

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ORDER"

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2. While plaintiff's decedent was working at the premises of B. F. Goodrich or B. F. Goodrich Chemical Company, he was not exposed to any vinyl chloride, or related product, which was manufactured by Dow.

William D. Ginn

William H. Wallace

James T. Crowley

David L. Parham

1100 National City Bank Building
Cleveland, Ohio 44114
(216) 241-1880

OF COUNSEL:

Thompson, Hine and Flory

Attorneys for Defendant
Dow Chemical Company

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CERTIFICATE OF SERVICE

Copies of the foregoing Requests By Defendant Dow Chemical Company For Admissions By Plaintiff (First Set) were mailed this day of January, 1978 to the following:

Steven A. Sindell, Attorney for Plaintiff
910 Leader Building, Cleveland, Ohio 44114

Irving Berger, Attorney for Defendants B. F. Goodrich Chemical Company and B. F. Goodrich Company
1700 Union Commerce Building, Cleveland, Ohio 44115

George Zucco, Attorney for Defendant International Commodities Export Company
1525 Leader Building, Cleveland, Ohio 44114

Frank Soldat, Attorney for Defendants Pittsburgh Plate Glass Company Chemical Division, Tenneco Chemicals, Inc., Monsanto Company, Ethyl Corporation Industrial Chemicals Division, Allied Chemical Corporation Industrial Chemicals Division, Stauffer Chemical Company Plastics Division, Precision Gas Products, Inc., and PPG Industries, Inc. Chemical Division
55 Public Square, Cleveland, Ohio 44113

McNeal, Schick, Archibald, Attorneys for Defendants Continental Oil Company, Conoco Chemicals Continental Oil Company, Conoco Chemicals and Scientific Gas Products, Inc.
520 Williamson Building, Cleveland, Ohio 44114

Gallagher, Sharp, Fulton, Norman & Mollison, Attorneys for Defendants Air Products and Chemicals, Inc. Chemicals Group and Air Products and Chemicals, Inc. Industrial Gas Division
630 Bulkley Building, Cleveland, Ohio 44115

Steven E. Sigalow, Attorney for Matheson Gas Products
1500 Akron Center Building, Akron, Ohio 44308

Walter Bates, Attorney for Defendants Borden Chemical, Borden, Inc. and Monochem, Inc.
1144 Union Commerce Building, Cleveland, Ohio 44115

Craig D. Barclay, Attorney for Defendant Montedison USA, Inc.
Suite 900, 37 W. Broad Street, Columbus, Ohio 43215

American Chemical Corporation, Defendant
2112 East 223rd Street, Long Beach, California 90810

Stinnes Oil & Chemical Company, Defendant
750 Third Avenue, New York, New York 10017

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Diamond Shamrock Chemical Co., Defendant
300 Union Commerce Building, Cleveland, Ohio 44115

Union Carbide Corporation, Chemicals & Plastics, Defendant
270 Park Avenue, New York, New York 10017

Shell Chemical Company, Chemical Sales, Defendant
One Shell Plaza, Houston, Texas 77002

Agriment, Inc., Defendant
445 Park Avenue, New York, New York 10022

Stanalchem, Inc., Defendant
299 Park Avenue, New York, New York 10017

Richard C. Talbert, Attorney for Defendant Allied Chemical
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2121 The Superior Bldg.
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